

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of)	
)	
United States Telephone Association)	
Petition for Rulemaking –)	RM No. 9707
2000 Biennial Regulatory Review)	
)	
)	

**COMMENTS OF SBC COMMUNICATIONS INC.
TO THE PETITION FOR RULEMAKING
OF THE UNITED STATES TELEPHONE ASSOCIATION**

SBC Communications, Inc.¹ (SBC) files these Comments on the Petition for Rulemaking for 2000 Biennial Regulatory Review filed by the United States Telephone Association (USTA). On October 14, the Commission issued a public notice establishing a comment cycle on the Petition for Rulemaking for 2000 Biennial Regulatory Review. That public notice established November 15th as the filing date for Comments.

SBC files these comments for the purpose of advising the Commission that SBC strongly supports the Petition filed by the USTA. SBC was a participant on the USTA committee that developed the Petition for Rulemaking. Thus, SBC was very active in assisting in the development of the positions taken in the USTA Petition.

SBC also supported the Petition for Rulemaking filed by USTA on September 30, 1998 in accordance with Section 11 proposing the elimination or streamlining of numerous Commission rules, and filed its own Petition for Biennial Review on May 8,

¹ SBC Communications Inc. is the parent company of various subsidiaries, including telecommunications carriers. These subsidiaries include Southwestern Bell Telephone Company (SWBT), Pacific Bell, Nevada Bell, and The Southern New England Telephone Company (SNET). The abbreviation "SBC" shall be used herein to include each of these subsidiaries as appropriate in the context.

1998. The petitions previously filed by both the USTA and SBC were comprehensive in nature, in that they evaluated all rules and regulations to determine which should be eliminated or modified as a result of no longer being in the public interest as required by Section 11. Both petitions requested that the FCC broadly and promptly act to eliminate unnecessary regulations and to pursue a course of regulatory parity for all consumers. Rather than implementing a thorough review of all rules and regulations, the Commission has pursued a policy of allowing individual bureaus to make biennial review proposals. While such proposals may have accomplished some reduction of unnecessary regulation, any reduction has more than been offset by additional regulation of ILECs that has accompanied the Commission's efforts to open markets to competition.

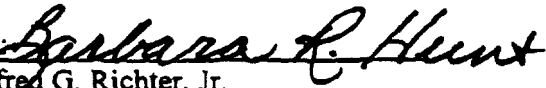
As further evidence of the need for a thorough and complete review, Chairman Kennard, in his August, 1999 strategic plan for the 21st century FCC, has cited implementation of an aggressive Year 2000 Biennial Review aimed at the elimination of unnecessary rules as a key policy initiative. That initiative was further supported by a number of parties in public forums and written submissions related to the new FCC structure.

A great deal of time and effort has gone into the development of USTA's Petition for Rulemaking for 2000 Biennial Regulatory Review and it deserves a full hearing and careful consideration by the Commission. As USTA and SBC pointed out last year and USTA reiterates this year, a serious, exhaustive and quantitative appraisal of the Commission's rules is not just the law, it is manifestly in the public interest.

For all of the very cogent reasons stated in the USTA Petition, SBC strongly urges the Commission to establish a Rulemaking and act favorably on the proposals set forth in the USTA Petition for Rulemaking for 2000 Biennial Regulatory Review.

Respectfully Submitted,

SBC COMMUNICATIONS INC.


By: 
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November 15, 1999

Certificate of Service

I, Katie Turner, hereby certify that the foregoing "Comments of SBC Communications Inc. to the Petition for Rulemaking of the United States Telephone Association" in RM No. 9707 has been served on November 15, 1999 to the Parties of Record.

A handwritten signature in cursive script that reads "Katie Turner". The signature is written in dark ink and is positioned above a horizontal line.

Katie Turner

November 15, 1999

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